

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

RICHARD P. by and for)	No. 03-390 Erie
RACHEL P. and DENISE L. by)	
and for KRISTINA L.,)	
)	
Plaintiffs,)	Electronically Filed
)	
v.)	Jury Trial Demanded
)	
SCHOOL DISTRICT OF THE CITY)	
OF ERIE, et al)	
)	
Defendants.)	

PLAINTIFFS' PROPOSED VERDICT INTERROGATORIES

I. RACHEL P.

1. Did the Plaintiff Rachel P. suffer from sexual harassment after the December 19, 2001, rape that was severe, pervasive, and objectively offensive and which undermined and detracted from her educational experience?

YES____ NO____

2. Was the School District deliberately indifferent to known acts of sexual harassment directed towards Rachel P. following the December 19, 2001 rape?

YES____ NO____

3. Did Rachel P. suffer injuries as a consequence of the School District's deliberate indifference to known acts of sexual harassment?

YES____ NO____

4. What damages do you award to Rachel P.?

ANSWER: \$_____

II. KRISTINA L.

1. Did the Plaintiff Kristina L. suffer from sexual harassment after the December 19, 2001, rape that was severe, pervasive, and objectively offensive and which undermined and detracted from her educational experience?

YES____ NO____

2. Was the School District deliberately indifferent to known acts of sexual harassment directed towards Kristina L. following the December 19, 2001, rape?

YES____ NO____

3. Did Kristina L. suffer injuries as a consequence of the School District's deliberate indifference to known acts of sexual harassment?

YES____ NO____

4. What damages do you award to Kristina L.?

ANSWER: \$ _____

III. DEFAMATION

1. Do you find Linda Cappabianca made defamatory statements about Rachel P. to Robin Johnson and her daughter, Toni Northrop?

YES _____ NO _____

2. What amount do you award Rachel P. for her loss of reputation, embarrassment, or anxiety, or other injuries as a result?

ANSWER: \$ _____

3. Do you find that Linda Cappabianca willfully or recklessly made defamatory statements about Rachel P.?

YES _____ NO _____

4. What amount of punitive damages do you award?

ANSWER: \$ _____

Respectfully submitted,

/s/ Edward A. Olds
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CERTIFICATE OF SERVICE

I hereby certify that on January 27, 2006, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

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S/ Edward A. Olds
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